

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)
Shenzhen Sunwell Industrial Co., Ltd.) Case No.: 25-cv-1949
)
Plaintiff,) Judge: Lindsay C. Jenkins
v.)
) Magistrate Judge: Heather K. McShain
The Partnerships and Unincorporated)
Associations Identified on Schedule A)
)
Defendants.)

PLAINTIFFS' MOTION FOR RELEASE OF BOND

Plaintiff Shenzhen Sunwell Industrial Co., Ltd. (“Plaintiff” or “Sunwell”), by and through its undersigned counsel, hereby moves this Court for an Order releasing the bond posted in this matter, and as grounds therefore states as follows:

1. On March 11, 2025, this Court issued an Order Granting *Ex Parte* Temporary Restraining Order (the “TRO;” Dkt. 19). The TRO required Plaintiff to post a total of ten thousand dollars (\$10,000) bond with the Court as payment of damages to which Defendants may be entitled for a wrongful injunction or restraint during the pendency of the action. (*Id.* at Paragraph 9.)
2. On March 14, 2025, Plaintiff posted a cash bond of ten-thousand-dollars (\$10,000) with the Court in compliance with the TRO.
3. Defendants 1 (doing business as HILLGA) and 2 (doing business as ZZD) have been dismissed without prejudice (Dkt. 55). Defendants 3 (doing business as KUURFUURDO), 4 (doing business as ViccoMK), 5 (doing business as Retail Hunters USA), and 6 (doing business as SUNSITT Patio) have been dismissed with prejudice (Dkt. 45, 57, 69, and 78).

Accordingly, now that this matter is closed, Plaintiff respectfully requests that this Court issue an Order releasing the \$10,000 bond posted on March 14, 2025 via regular mail to counsel

of record for Plaintiff, Nicholas P. Zalany of Calfee, Halter & Griswold LLP at 1405 East Sixth Street, Cleveland, OH 44114.

Date: June 20, 2025

Respectfully submitted,

/s/Yizhou Liu

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